October 31, 2002

Mr. A. Christopher Bakken III, Senior Vice President
and Chief Nuclear Officer
Indiana Michigan Power Company
Nuclear Generation Group
500 Circle Drive
Buchanan, MI 49107

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST, "ONE TIME EXTENSION OF INTEGRATED CONTAINMENT LEAK RATE TEST INTERVAL," DATED APRIL 11, 2002 (TAC NOS. MB4837 AND MB4838)

Dear Mr. Bakken:

By application dated April 11, 2002, the Indiana Michigan Power Company submitted a license amendment request that would revise the Technical Specifications (TSs) for the Donald C. Cook Nuclear Plant, Units 1 and 2, to revise the surveillance requirements for containment leakage rate testing in TS 4.6.1.2 to allow a one-time extension of the interval between integrated leakage rate tests from 10 to 15 years.

The Nuclear Regulatory Commission (NRC) staff has reviewed your April 11, 2002, application, and concluded that it does not provide technical information in sufficient detail to enable the staff to make an independent assessment regarding the acceptability of the proposal in terms of regulatory requirements and the protection of public health and safety. Enclosed is the NRC staff's request for additional information (RAI).

The draft RAI was e-mailed to your staff to facilitate conference calls held October 1, 9 and 15, 2002, with Mr. Joe Waters, et. al., of your staff regarding the RAI. The enclosed RAI is similar in content to the draft RAI that was e-mailed to your staff. A mutually agreeable target date of November 8, 2002, for your response was established. The NRC staff will continue reviewing your application when your response to the enclosed RAI is received.

If circumstances result in the need to revise that target date, please contact me at (301) 415-1345.

Sincerely,

/RA/

John F. Stang, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure: Request for Additional Information

cc w/encl: See next page

If circumstances result in the need to revise that target date, please contact me at (301) 415-1345.

Sincerely,

/RA/

John F. Stang, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
D.C. COOK NUCLEAR PLANT, UNITS 1, 2
ONE TIME EXTENSION OF INTEGRATED CONTAINMENT LEAK RATE TEST INTERVAL

Based on the NRC staff review of the proposed license amendment, dated April 11, 2002, the following information is required to allow the NRC staff to make an independent assessment:

1. Based on the review of the proposed license amendment, the NRC staff understands that you are using the 1992 Edition and the 1992 Addenda of Subsections IWE and IWL of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code. Reference 1 also describes the findings of corrosion and thru-wall hole in the liner plate of Unit 2 containment. In addressing "containment inspection history", you indicate that there are no areas that require augmented examination. Please provide justification for not identifying the areas of the degraded liner plates and penetrations (accepted by engineering evaluation), and other suspect areas not requiring additional examination (as per IWE-2430), or augmented examination (as per IWE-1240) during the subsequent inspection periods.

1. Please provide the following information related to the finding of the through-wall hole in the Unit 2 liner plate:

    a. Please provide location (elevation, azimuth), liner thickness, nearness to discontinuity areas (i.e. areas that would be subjected to bending under the postulated loadings, or thickness transition), size of the opening made to remove the wire brush, and corrective actions taken to ensure the integrity of the liner plate.

    b. You postulate that the through-liner hole was due to the inadequate repair of the liner hole drilled in error during construction. How did you verify that there are no such holes and repairs in other areas, and in the uninspectable areas of the containment liners in both Unit 1 and Unit 2?

    c. Investigation of other incidents of such through-wall hole in liner plates indicated the cause to be corrosion induced by the foreign elements stuck in the containment concrete. It appears that the Unit 2 through-wall hole in the liner was due to similar reason. In the 1992 integrated leak rate test (ILRT), the corrosion had not propagated to the extent that the ILRT would fail. However, if the ILRT were performed prior to this finding, the containment leakage rate could have been unacceptable. Please provide specific discussion of this potential for each unit at D.C. Cook.

    d. Recognizing the discussion in "b," and "c" above, please provide justification for not performing ILRT after the through-liner hole finding, or in accordance with the present technical specification requirement.

3. Please provide a summary of findings of the examination of containment concrete performed in accordance with 10 CFR 50.55a and Subsection IWL including the acceptance criteria used for accepting concrete and reinforcing bar degradation.

ENCLOSURE

4. Inspections of some reinforced and steel containments (e.g., North Anna, Brunswick, D. C. Cook, Oyster Creek) have indicated degradation from the uninspectable side of the liner/steel shell of primary containments. The major uninspectable areas of the ice condenser containment include those behind the ice baskets and part of the shell (liner) embedded in the basemat. Please provide information as to how potential leakage due to age related degradation from these uninspectable areas are factored into the risk assessment in support of the requested ILRT interval extension.

Donald C. Cook Nuclear Plant, Units 1 and 2

cc:

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Attorney General
Department of Attorney General
525 West Ottawa Street
Lansing, MI 48913

Township Supervisor
Lake Township Hall
P.O. Box 818
Bridgman, MI 49106

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
7700 Red Arrow Highway
Stevensville, MI 49127

David W. Jenkins, Esquire
Indiana Michigan Power Company
One Cook Place
Bridgman, MI 49106

Mayor, City of Bridgman
P.O. Box 366
Bridgman, MI 49106

Special Assistant to the Governor
Room 1 - State Capitol
Lansing, MI 48909

Drinking Water and Radiological
Project Division
Michigan Department of
Environmental Quality
3423 N. Martin Luther King Jr. Blvd.
P. O. Box 30630, CPH Mailroom
Lansing, MI 48909-8130

Scot A. Greenlee
Director, Nuclear Technical Services
Indiana Michigan Power Company
Nuclear Generation Group
500 Circle Drive
Buchanan, MI 49107

David A. Lochbaum
Union of Concerned Scientists
1616 P Street NW, Suite 310
Washington, DC 20036-1495

Michael J. Finissi
Plant Manager
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

Joseph E. Pollock
Site Vice President
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106